BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED
07-10-06
04:59 PM

Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program.	))))	R.05-12-013

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT DECISION ON REMAINING PHASE 1 ISSUES

FRANK J. COOLEY
MICHAEL A. BACKSTROM

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6944
Facsimile: (626) 302-3990
E-mail: Michael.Backstrom@sce.com

Dated: **July 10, 2006**

Comments Of Southern California Edison Company (U 338-E) On Proposed Decision On Local Resource Adequacy Requirements

TABLE OF CONTENTS

TABLE OF CONTENTS (CONTINUED)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program.	))))	R.05-12-013

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT DECISION ON REMAINING PHASE 1 ISSUES

Pursuant to Rule 77.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), Southern California Edison Company ("SCE") hereby submits the following comments on the Draft Decision on Remaining Phase 1 Issues ("DD"). SCE generally supports the DD, which provides a thorough and reasoned analysis of the issues involved with a tradable Resource Adequacy ("RA") Capacity product and the remaining RA program implementation issues raised in Phase 1 of this proceeding. In these comments, SCE recommends certain modifications to the DD to authorize and streamline the process of contracting for RA Capacity products. SCE also requests that the DD allow for the consideration of three key issues in Phase 2 of this proceeding regarding the equitable administration of the RA program.

Specifically, SCE requests that:

1) The DD be modified to approve an amendment to the IOUs' Procurement Plans that allows for transactions of the tradable RA Capacity product adopted in the decision, at least through 2007, without requiring the IOUs to submit advice filings for approval;
2) The DD's "essential contracting elements" for RA Capacity product contracts be revised in the following manner:

- Remove provisions that would affirmatively preclude LSEs from separately contracting for Local RA credits and System RA credits from the same resource;
- Strike the requirements that RA Capacity Product contracts must include an RA accounting rule (i.e. retention of the qualifying capacity ("QC") value for a resource throughout the compliance year) and must provide for retention of the "benefit of the bargain" any time the Commission modifies the RA program or the CAISO modifies its tariffs;
- Eliminate the 1 MW minimum size requirement for RA Capacity products;
- Remove the statements that limit RA Capacity products to being written only for individual generating units, which directly conflict with the DD's correct conclusion that unit substitution should be permitted; and
- Strike the excess contract provisions relating to specific CAISO unit commitment and dispatch requirements, which are properly incorporated into the contracts by cross-referencing the CAISO Tariff itself;

3) The Commission expressly permit Phase 2 workshops in this proceeding on the issue of adjusting the planning reserve margin, in light of the policy adopted in the DD that allows only annual derates of QC;
4) The DD be modified to allow parties to address, in Phase 2 of this proceeding, the RA program treatment of outage requests that are not acted upon by CAISO prior to an LSE's RA compliance filing; and
5) The Commission allow for Phase 2 workshops to evaluate the benefits of using loss factors to quantify transmission losses in the RA program as opposed to the flat 3% increase to load forecasts.

A final decision incorporating the above recommended modifications would provide the parties with a clear and reasonable set of criteria for tradable RA Capacity products and bring an appropriate conclusion to Phase 1 of this proceeding.

I.

RA CAPACITY PRODUCT

A. The DD Should Approve An Amendment To The IOUs' Procurement Plans To Allow IOU Transactions In The RA Capacity Product Adopted In This Decision Without Requiring The IOUs To Submit Advice Filings That Must Then Be Approved By The Commission

The DD adopts all the essential elements for a tradable RA Capacity product that counts for System and Local RA credit, and indicates that the Commission should not prescribe non-essential elements.[1] However, the DD states "[t]o the extent, if any, that the IOUs find it necessary to modify their Long Term Procurement Plans to comply with these requirements [for RA Capacity products], they should file advice letters proposing such modifications."[2] SCE urges the Commission to remove this advice filing requirement, at least for 2007 procurement.

The IOUs' Procurement Plans include a list of authorized products. Although the Commission did approve an amendment to PG&E's Procurement Plan allowing PG&E to transact using its proposed version of an RA-countable capacity product, SCE understands this authority expires at the end of 2006. Accordingly, it appears to SCE that the IOUs presently have no express authority in their Procurement Plans to transact in tradable RA Capacity products for delivery in 2007 or beyond. Moreover, it would be a relatively straightforward matter for the Commission's final decision to incorporate a statement amending the IOUs' Procurement Plans to allow transactions in the products approved by the decision.

Although SCE and the other IOUs could submit advice letter filings requesting authorization to transact in the approved RA Capacity products, any transactions for 2007 or later delivery would be delayed until the Commission acts on the advice filings. As the Commission is well aware, approval of advice letters can take several months or longer. Since the date established in D.06-06-064 for the 2007 year-ahead demonstration for System and Local RA Capacity is October 31, 2006, there is not much time remaining for IOUs to transact from the date of a final decision (potentially July 20, 2006) until the showing date (approximately 3

---

1 DD at 24-33.
2 *Id.*, at 28.

months). Therefore, SCE requests that the Commission act now in this decision to modify the IOU Procurement Plans and allow transactions in the newly-approved RA Capacity product. If the Commission wants the IOUs to file additional information relative to their use of the RA Capacity product (if any such information is needed), at a minimum the Commission could approve a limited amendment to the IOU Procurement Plans to allow transactions only through 2007.

Accordingly, SCE recommends that the DD be modified to strike the first full sentence on page 28 (quoted above) and to add the following Ordering Paragraph No. 4:

> 4. The IOU Procurement Plans are hereby modified to allow transactions in the RA Capacity products approved in this decision.

B. The "Essential Features" of an RA Capacity Product Enumerated in the Draft Decision Require Some Modifications

1. LSEs Should Be Permitted To Purchase And/Or Sell the Local RA Capacity of a Unit Separately from the System RA Capacity of the Unit

In Category 5 of the five categories of "essential contract elements" for RA Capacity products stated in the DD, parties are expressly prohibited from contracting separately for the Local and System RAR credits of a generating unit:

> RAR Capacity Products that satisfy Local RAR for a particular LSE must also be reported by that same LSE to satisfy System RAR. There is to be no separation of system and local credit of units between LSEs for purposes of System and Local RAR compliance. Units may sell partial capacity to different LSEs, but cannot sell the same Local RA Capacity and System RA Capacity to different buyers.[3]

The DD provides no reasons for the prohibition on unbundling Local and System RA Capacity. SCE strongly urges the Commission not to foreclose parties from unbundling Local and System RA Capacity. There are several practical reasons for this. First, the

---

[3] DD at 33 (Category 5, Item #1c).

Commission requires month-ahead showings for System RA Capacity, but only a single year-ahead showing for Local RA Capacity. Under these circumstances, it would be appropriate and desirable for LSEs to separately purchase and sell Local and System RA Capacity if certain conditions exist. Assume, for example, that an LSE has a surplus of Local RA Capacity in one or more local areas, and enough System RA Capacity for the annual showing (at least 90% of 115% of average-year peak load), but not enough for the monthly System RA showing for one or more months (less than 100% of 115% of average-year peak load for these months). A logical and efficient transaction approach would be for the LSE to merely sell its "long" Local RA Capacity prior to the year-ahead showing, and later purchase System RA Capacity for those months in which it is "short" System RA Capacity. However, if the prohibition of unbundling System and Local RA Capacity is not removed from the DD, this beneficial strategy cannot be followed.

Another consideration is that the Commission has established (by D.06-06-064) Local RA Capacity requirements for only one year, 2007, whereas the System RA Capacity requirements (100% of 115%) are likely to remain the same for several years into the future. Hence, it makes sense for LSEs to acquire (and generators to sell) a System RA Capacity product for a multi-year term to facilitate multi-year hedging (and revenue certainty). However, acquiring a multi-year Local RA Capacity product creates risk for an LSE insofar as the Local RA Capacity requirement could be reduced in future years due to transmission system upgrades or changes to the study criteria. Accordingly, it is reasonable to allow LSEs the flexibility to select and acquire what RA products they determine they need without forcing them to acquire products they don't necessarily want due to bundling.

D.06-06-064 indicates that there are 27,564 MWs of QC that are located in nine local areas (the decision consolidates the number of local areas to four).[4] Therefore, a very high percentage of the total System RA Capacity that can be procured by LSEs will be, under the DD, bundled System and Local RA Capacity. Accordingly, when LSEs are seeking to balance their portfolios to eliminate "long" (surplus) or "short" (deficit) positions in System RA Capacity or Local RA Capacity for each of the four local areas, bundling of System and Local RA Capacity may require LSEs to sell an attribute they actually want, in order to eliminate an attribute they do

---

[4] D.06-06-064 at 19.

not need. Alternatively, LSEs may receive offers for attributes they don't want bundled with the attribute they are seeking. It is likely that transactions to eliminate long or short positions in a particular attribute will result in the creation of long or short positions in other attributes. This will cause additional transactions to deal with the new long or short positions, which, in turn, may give rise to the need for further transactions to balance the portfolio, and so on. The end result would likely be higher costs to LSEs and the customers they serve.

SCE therefore recommends that the Commission strike Item #1c from Category 5 of the essential contract elements, to allow for the development and trading of Local and System RA Capacity products that LSEs, generators, and marketers will find useful in the near term. Consistent with the approach of unbundling the System RAR and Local RAR attributes, the SCE-led industry group[5] developing an RA countable capacity product is incorporating this concept into its draft commercial agreements.

2. Accounting Rules and Responses to Subsequent Commission Decisions or CAISO Tariff Amendments Should Not Be Required Elements of RA Capacity Product Contracts

In Category 1 of the essential contract elements, the DD requires RA Capacity product contracts to state that the product being purchased:

> retains its Qualifying Capacity value for the compliance year irrespective of forced outages or unit performance during the compliance year, ...[6]

SCE strongly agrees with the DD's policy determination that the Commission should freeze the QC value of an RA Capacity product for the compliance year, irrespective of forced outages or unit performance.[7] However, the extent to which such a product retains its QC value during a compliance year is solely an accounting rule that should be applied by the Commission when

---

[5] Since the beginning of 2006, SCE has been leading an industry group effort to develop consensus around a tradable RA Capacity product (or products). This industry group is open to all market participants and has had broad participation to date. This industry group has been incorporating the feature of unbundled Local RAR and System RAR attributes into its draft commercial agreements for an RA Capacity product.

[6] DD at 29 (Category 1, Item #4c).

[7] *Id.*, at 9 ("LSEs will rely upon this [July 1] QC list for their year-ahead and month-ahead RAR compliance filings for and throughout the applicable compliance year").

assessing RA program compliance. It should not become a mandatory element of bilateral contracting for RA Capacity products. Neither the buyer nor the seller of any RA Capacity product can guarantee the future QC for a particular generating unit. Accordingly, the DD should be modified to remove item #4c from the list of essential contract elements appearing in Category 1.

The DD further states that parties transacting RA Capacity products agree to negotiate in good faith to make necessary amendments to "maintain the benefits of the bargain struck by the parties," in light of any subsequent Commission decisions, revisions to the RA program, or changes in CAISO tariffs.[8] While retaining the original benefits of a negotiated agreement may be a desirable contracting element for some parties, it does not ensure compliance with the RA program. Whether or not the original "benefits" of a particular contract remain in place when RA program requirements are modified is not directly linked to whether an LSE is able to satisfy its RA obligations or whether a generator will make its RA capacity available to the CAISO. Thus, it should be left to bilateral negotiations to determine whether a benefit of the bargain retention provision is included in a particular contract.

3. RA Capacity Products Should Not Be Subject to a Minimum Size Requirement

The DD sets, without any discussion or supporting reasoning, a minimum size requirement of 1 MW for tradable RA Capacity products: "An RA Capacity product is denominated in any size, with the minimum of one megawatt increments . . . ."[9] Importantly, there is nothing in the Tradable Capacity Product Workshop Report or elsewhere in the record in this proceeding regarding tradable RA Capacity products that supports a 1 MW minimum unit requirement. The DD should not arbitrarily set such a requirement, which would have significant adverse consequences for the RA program. SCE estimates that a 1 MW minimum unit requirement (when combined with the prohibition on LSEs claiming more RA credit than the QC of an individual unit, discussed in Part A.4 below) would disallow at least 150 MW from the RA program (based on the CAISO QC list for July-December 2006). This disallowance

---

[8] *Id.*, at 29 (Category 1, Item #7).

[9] *Id.*, at 28 (Category 1, Item #2), *see also id.*, at 32 (Category 4, Item #3a) (allowing subdivision of RA Capacity products, provided "the quantity of any resulting RA Capacity product is not less than one megawatt").

would disproportionately impact the QC of smaller qualifying facilities ("QFs") and renewable generating units. Moreover, the 1 MW minimum unit requirement is inconsistent with the CAISO's process for defining QC. The CAISO process, which should be the basis for the Commission's RA compliance requirements, defines QC in 0.01 MW increments.[10]

In sum, the size of an RA Capacity product does not need to be, and should not be, pre-defined in 1 MW minimum units. The size of the product to be acquired or sold should be left to the parties to determine in bilateral negotiations, consistent with the requirements of the CAISO grid.

4. Limiting the QC of an RA Capacity Product to That of an Individual Generating Unit Is In Direct Conflict With the Correct Decision to Allow For The Substitution of System RAR Resources

Section 3.9 of the DD correctly reaches the conclusion that substitution of System RAR resources should be allowed up to the month-ahead showing.[11] As noted in the DD, the ability to pool a portfolio of assets can help reduce the seller's counting risks and allow optimization of the generation fleet over different times of the year.[12] However, the DD further proposes, as an essential contract element, the limitation that an RA Capacity product ". . . is always written for a single generating unit . . . ."[13] This proposed contract element directly conflicts with the well-reasoned benefits of permitting resource substitution, by restricting RA Capacity products to only a single unit identification. In order to eliminate this conflict and preserve the appropriate determination that substitution of System RAR resources will be permitted, SCE recommends the following modification to Item #4b within Category 1 of the essential contract elements:

> 4. An RA Capacity product:
>
> b. ~~is always written for a single generating unit and~~ the magnitude of the Capacity Product can never be larger than the total qualifying capacity of the generating unit(s) for the month as

---

[10] *See* CAISO Net Qualifying Capacity Listing for the Compliance Months July-December, 2006, located at http://www.caiso.com/17fe/17fedcca1d840.xls.

[11] DD at 23.

[12] *Id.*, at 21.

[13] *Id.*, at 28 (Category 1, Item #4b).

enumerated on the qualifying capacity list then being used for compliance purposes, ...

5. Availability Requirements Should Be Linked To The Operative CAISO Tariff Requirements

In Category 3 of the essential contract elements, the DD proposes a series of specific provisions for RA Capacity product contracts that are intended to ensure that the parties comply with certain CAISO requirements for unit commitment and dispatch, as well as information gathering and reporting.[14] Specifically, these contract provisions relate to (1) applying must-offer requirements to generators both prior to, and following implementation of, CAISO's Market Redesign and Technology Update ("MRTU") (Items #2a-d), (2) availability requirements in the event the must-offer obligation is no longer operative (Item #2e), and (3) an explicit requirement for generating units to comply with applicable CAISO data collection, testing, and reporting requirements (Item #3). While these provisions may be generally consistent with the current CAISO Tariff, the DD's provisions are not necessary or desirable as specific contract elements, particularly given the CAISO Tariff's susceptibility to future modification. A more direct approach to ensuring that generating units comply with the CAISO's requirements for RA resources would be to simply refer to and incorporate the operative CAISO Tariff – which explicitly includes the CAISO's RA program requirements – into the RA Capacity product contracts.[15]

Indeed, Item #1 of Category 3 in the DD already provides a catch-all requirement that RA Capacity product contracts must ensure generator compliance with CAISO Tariff requirements and updates.[16] The Commission can accomplish its goal of requiring generator compliance with CAISO requirements through this catch-all provision, without the added burden of requiring specific contract elements that may become outdated or even directly conflict with future amendments to the CAISO Tariff. SCE therefore recommends that the Commission simplify its incorporation of the CAISO RA requirements by deleting Items #2 and #3 of Category 3 in their entirety, and modifying Item #1 of Category 3 as follows:

---

[14] *Id.*, at 30-31 (Category 3, Items # 2-3).

[15] CAISO Conformed Simplified and Reorganized Tariff, accepted by FERC as of March 6, 2006, at Section 40.

[16] DD at 30 ("Generating units underlying RA Capacity products must be subject to all applicable CAISO Tariff requirements . . . .").

1. Generating units underlying RA Capacity products must be subject to all applicable CAISO Tariff requirements~~, including submitting supply schedules~~.

C. The Draft Decision's Treatment of Unit Derates Requires A Corresponding Modification of LSEs' Required Planning Reserve Margin

Section 3.2 of the DD states, "[f]or purposes of the RAR program, unit derates would thus be reflected in next year's QC list."[17] SCE does not object to the DD's determination that unit derates should be reflected in the CAISO's official list of QC for the following compliance year. Indeed, SCE strongly supports the determination that "once the [QC] list is established for a compliance year, LSEs will not be required to engage in additional procurement as a result of any change in the QC for a unit that was used in its compliance filing."[18] However, the annual derate policy for QC cannot be implemented unless the Commission ensures that a process is implemented for adjusting the planning reserve margin ("PRM") criteria in order to avoid an unintentional and expensive increase in the effective PRM resulting from the derates.

The effect of a unit derate on the PRM has already been recognized by the Commission. In D.05-10-042, the Commission found that the 15-17% PRM it adopted for the RAR program should be revisited as necessary to account for the increased relationship between a resource's QC and the CAISO's capacity rating for that resource. The Commission explained, "the required 15-17% reserve margin should be evaluated and possibly adjusted . . . because if average forced outage rates decline as a result of tying RAR eligibility to performance, then presumably the overall requirement could be reduced."[19] Similarly, the DD itself implicitly identifies the need to revisit the PRM, by acknowledging that "the reserve margin that [the Commission] adopted in D.04-01-050 encompasses forced outages."[20]

In order to ensure that California's ratepayers are not subsidizing a PRM that is higher than what the Commission determines to be reasonable, the DD should allow for Phase 2 workshops on the issue of revising the PRM. Accordingly, the last paragraph of Section 3.2 of the DD should be modified as follows.

---

17 *Id.*, at 12.
18 *Id.*
19 D.05-10-042 at 20.
20 DD at 10.

> For purposes of the RAR program, unit derates would thus be reflected in next year's QC list. The Commission, however, recognizes that this may result in a need to revise the current 15-17% planning reserve margin, and allows parties to raise that issue in Phase 2 of this proceeding.

Similarly, Conclusion of Law No. 4 of the DD should be modified to read:

> 4. For purposes of the RAR program, unit derates during an RAR compliance year should be reflected in the next year's QC list. The Commission recognizes that this may result in a need to revise the current 15-17% planning reserve margin, and allows parties to raise that issue in Phase 2 of this proceeding.

D. The Draft Decision Should Carry-Over Into Phase 2 The Need To Integrate CAISO's Actions On Proposed Scheduled Outages With LSE's RA Showings

Section 3.1 of the DD, among other things, describes the proposed treatment of scheduled outages with respect to the QC of a given RA resource.[21] SCE strongly supports the DD's adopted policy that CAISO "changes" to an approved scheduled outage for an RAR resource will not result in an LSE being held responsible for procuring replacement capacity.[22] However, the DD is unclear with respect to which CAISO approval process will be the basis for concluding that a scheduled outage has been "approved," and therefore, that an LSE would be exempt from the replacement procurement obligation if the CAISO were to further "change" the scheduled outage. SCE requests that the DD be modified as described below to allow for workshops in Phase 2 to facilitate certainty on this issue.

After discussing the treatment of scheduled outages in Section 3.1, the DD's list of essential contract elements suggests that all scheduled outage approvals would occur only during an annual CAISO scheduling process:

> To the extent that a CAISO-initiated outage scheduling change subsequent to the CAISO approved outage schedule renders a generator unit unqualified to provide RA capacity, then the RA Capacity product retains its original value. CAISO denial of a

---

[21] *Id.*, at 10-11.
[22] *Id.,* at 10.

> proposed outage during the ***annual generator outage scheduling process*** does not constitute a change that affects RA capacity.[23]

However, the current process for CAISO outage requests requires scheduling coordinators to submit a rolling 12-month planned outage request *each quarter*. These requests, or parts of these requests, are not always approved by the CAISO within a set timeframe. Instead, the CAISO often flags certain unit outage requests as "pending," and defers action on the requests – in some instances acting only a matter of weeks or days before the requested outage date. For these reasons, many of the LSE-scheduled outage requests would not be "approved" by the CAISO on an annual basis. This creates greater uncertainty for LSEs' procurement requirements for both the year-ahead and month-ahead RA compliance showings. In fact, an outage request that was submitted to the CAISO but kept in "pending" status would never be exempt from replacement procurement due to a CAISO denial or movement of the outage, even if the CAISO's decision occurred the day after an RA compliance filing.

The DD, as currently written, provides no incentive for the CAISO to make timely decisions on outage requests. Insofar as the particulars of the CAISO's practices were not discussed in Phase 1 workshops, SCE requests that the Commission consider working in Phase 2 with the CAISO and LSEs to create a process for the proper RA program treatment of outage requests, that accounts for both the CAISO's practices in dealing with outage requests and the LSEs' need for certainty in regard to their RA showings. SCE thus recommends that the last paragraph of Section 3.1 in the DD be modified to include as its last sentence:

> The Commission will schedule workshops in Phase 2 of this proceeding to address the manner in which scheduled outage requests should be reflected in LSEs' RA compliance filings in light of the CAISO's procedures for responding to outage requests.

---

[23] *Id.*, at 29 (Category 1, Item #5) (emphasis added).

II.

IMPLEMENTATION ISSUES

A. SCE's Proposal To Apply Loss Factors In Place of the Flat 3-Percent Increase In Load Forecasts Has Substantial Benefits And Should Be Adopted

SCE recommended in its April 21 Comments on the Advisory Staff Workshop Report that, beginning with the RA compliance showings for 2007, transmission losses be accounted for based on the application of loss factors, with all resources and loads adjusted to a common reference point – the CAISO grid (commonly referred to as "at CAISO") – rather than continuing to use the flat 3% increase to load forecasts adopted by the Commission for the 2006 RA showing.[24] The DD rejects SCE's proposal on the basis that the net benefits of the proposal are "unclear," while the application of loss factors would add administrative complexity to the RAR program.[25] SCE requests that the Commission reconsider this determination and provide parties an opportunity in Phase 2 of this proceeding to further demonstrate the net benefits of applying loss factors to account for transmission losses as part of the RA program.

SCE will not repeat its entire proposal for applying loss factors to transmission losses here, as the proposal is captured in its April 21 Comments. In the April 21 Comments, SCE described how the QC of resources could be appropriately adjusted for RA compliance showings to reflect their adjusted capacity at CAISO. This would involve (1) using the CAISO-developed Generation Meter Multipliers (GMM) for resources connected to the CAISO Transmission Grid, (2) making no adjustment for Scheduling Coordinator ("SC") to SC trades (such resources are already at CAISO), and (3) applying the loss factors specified in the Wholesale Distribution Access Tariff ("WDAT") of the applicable Participating Transmission Owner for resources connected at the distribution level and for demand response resources.[26] Application of these loss factors would be a matter of straight-forward multiplication of GMMs or WDAT loss factors to the CAISO-identified QC of specific resources, and should not be viewed as imposing significant administrative complexity.

---

[24] SCE Comments on Advisory Staff Workshop Report, April 21, 2006, ("SCE April 21 Comments") at 19-21.
[25] DD at 37.
[26] SCE April 21 Comments at 20-21.

Moreover, there are substantial benefits to adopting the loss factor approach over the flat 3% load forecast increase. By treating all resources in the same fashion, the 3% increase approach unfairly subsidizes out-of-state resources that actually incur higher losses than those resources closer to an LSE's load. The loss factor approach, on the other hand, provides the right value incentives to the resources that contribute to grid efficiency. For example, under the loss factor approach, LSEs would have a strong incentive to procure capacity from units that provide negative losses because the full QC of such resources would be included in the RA showings, while the QC of resources that are less beneficial to the grid due to their losses would be reduced by the appropriate loss factor. Based on a preliminary review of RA resources in its portfolio, SCE believes that application of the flat 3% increase to its load forecast causes it to lose the ability to count over 270 MW of capacity in its RA showings that would count under the loss factor approach. Because SCE recognizes that these comments are not the appropriate forum to develop the record to fully quantify the benefits of the loss factor approach, it strongly urges the Commission to allow this issue to be further explored via workshops in Phase 2 of this proceeding.

Thus, SCE recommends that the last paragraph of Section 4.3 of the DD be modified as follows:

> Resolving this issue requires a balancing of the objectives of administrative simplicity and accuracy in resource counting protocols. Since the net benefits of SCE's proposed approach are unclear, ~~but it is clear that it would add administrative complexity that could be costly for participants as well as the Commission and the CAISO to administer,~~ we choose not to approve this approach at this time. <u>However, this proposal should be revisited in Phase 2 of this proceeding to further examine the extent of the benefits it may provide.</u>

In addition, SCE recommends that Finding of Fact #19, regarding administrative complexity in SCE's proposed approach, be deleted in its entirety.

III.

CONCLUSION

For all of the foregoing reasons, SCE requests that the DD be modified as set forth above.

Respectfully submitted,

FRANK J. COOLEY
MICHAEL A. BACKSTROM

/s/
By: Michael A. Backstrom

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6944
Facsimile: (626) 302-3990
E-mail:Michael.Backstrom@sce.com

July 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT DECISION ON REMAINING PHASE 1 ISSUES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of July, 2006**, at Rosemead, California.

__/s/___Robin Taylor_____
Robin Taylor
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

KENNETH E. ABREU
853 OVERLOOK COURT
SAN MATEO, CA 94403
R.05-12-013

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770
R.05-12-013

STACY AGUAYO
MANAGER OF REGUALTORY AFFAIRS
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
R.05-12-013

KEONI ALMEIDA
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE RD.
FOLSOM, CA 95630
R.05-12-013

BOB ANDERSON
APS ENERGY SERVICES
1500 FIRST AVENUE, SUITE 101
ROCHESTER, MN 55906
R.05-12-013

FRANK ANNUNZIATO
PRESIDENT
AMERICAN UTILITY NETWORK INC.
10705 DEER CANYON DR.
ALTA LOMA, CA 91737-2483
R.05-12-013

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.05-12-013

E. JESUS ARREDONDO
DIRECTOR, REGULATORY AND GOVERNMENTAL
NRG ENERGY, INC.
4600 CARLSBAD BLVD.
CARLSBAD, CA 99208
R.05-12-013

Kathryn Auriemma
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4002
SAN FRANCISCO, CA 94102-3214
R.05-12-013

PHILIPPE AUCLAIR
353 SACRAMENTO STREET, SUITE 1700
SAN FRANCISCO, CA 94111
R.05-12-013

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.05-12-013

GREG BASS
SEMPRA ENERGY SOLUTIONS
101 ASH ST. HQ09
SAN DIEGO, CA 92101
R.05-12-013

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.05-12-013

BONNIE S. BLAIR
THOMPSON COBURN LLP
1909 K STREET, N.W., SUITE 600
WASHINGTON, DC 20006-1167-1167
R.05-12-013

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING, P.C.
915 L STREET, STE. 1420
SACRAMENTO, CA 95814
R.05-12-013

GREGORY T. BLUE
MANAGER, STATE REGULATORY AFFAIRS
DYNEGY INC.
2420 CAMINO RAMON, BLDG. J, STE. 215
SAN RAMON, CA 94583
R.05-12-013

TRACI L BONE
STAFF COUNSEL
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
R.05-12-013

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL STREET, 5TH FLOOR
WALNUT CREEK, CA 94596
R.05-12-013

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002
R.05-12-013

Donald J. Brooks
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-12-013

C. ANTHONY BRAUN
Braun & Blaising, P.C.
915 L STREET, SUITE 1460
SACRAMENTO, CA 95814-3705
R.05-12-013

DONALD BROOKHYSER
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 S.W. 5TH AVENUE, SUITE 1750
ALCANTAR & KAHL LLP
PORTLAND, OR 97201
R.05-12-013

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.05-12-013

SEAN CASEY
SAN FRANCISCO PUBLIC UTILITIES COMMISSIO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
R.05-12-013

Bishu Chatterjee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 3-E
SAN FRANCISCO, CA 94102-3214
R.05-12-013

JENNIFER CHAMBERLIN
STRATEGIC ENERGY
2633 WELLINGTON CT.
CLYDE, CA 94520
R.05-12-013

ED CHANG
FLYNN RESOURCE CONSULTANTS, INC.
2165 MOONSTONE CIRCLE
EL DORADO HILLS, CA 95762
R.05-12-013

LAURENCE CHASET
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5131
SAN FRANCISCO, CA 94102-3214-3214
R.05-12-013

BILL CHEN
CONSTELLATION NEWENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK, CA 94596
R.05-12-013

BRIAN K. CHERRY
REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 B10C
SAN FRANCISCO, CA 94177--0001
R.05-12-013

KRIS G. CHISHOLM
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
770 L STREET, SUITE 1250
SACRAMENTO, CA 95814
R.05-12-013

ALAN COMNES
WEST COAST POWER
3934 SE ASH STREET
PORTLAND, OR 97214
R.05-12-013

JOSEPH PETER COMO
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
Dennis Herrera and City & County of San Francisco
SAN FRANCISCO, CA 94102
R.05-12-013

THOMAS CORR
SEMPRA ENERGY
101 ASH STREET, HQ 08
SAN DIEGO, CA 92101-3017
R.05-12-013

LISA A. COTTLE
ATTORNEY AT LAW
WINSTON & STRAWN, LLP
101 CALIFORNIA STREET, SUITE 3900
SAN FRANCISCO, CA 94111-5894
R.05-12-013

DAVID J. COYLE
ANZA ELECTRIC COOPERATIVE, INC
58470 HIGHWAY CO-OPERATIVE INC
PO BOX 391090
ANZA, CA 92539-1909
R.05-12-013

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-12-013

HOLLY B CRONIN
ASSOC. HEP UTILITIES ENGINEER
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821
R.05-12-013

SEBASTIEN CSAPO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-12-013

THOMAS DARTON
PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, SUITE 112
SAN DIEGO, CA 92123
R.05-12-013

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-12-013

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-12-013

LISA DECKER
111 MARKET PLACE, SUITE 500
BALTIMORE, MD 21202
R.05-12-013

RALPH E. DENNIS
DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE, KY 40223
R.05-12-013

GARY DESHAZO
REGIONAL TRANSMISSION MANAGER
CALIFORNIA ISO
PO BOX 639014
FOLSOM, CA 95763-9014
R.05-12-013

GINA M. DIXON
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, M.S. CP32D
SAN DIEGO, CA 92123
R.05-12-013

Elizabeth Dorman
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5130
SAN FRANCISCO, CA 94102-3214
R.05-12-013

LOS ANGELES DOCKET OFFICE
LOS ANGELES DOCKET OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION
320 W. 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
R.05-12-013

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
R.05-12-013

TRACEY DRABANT
ENERGY RESOURCE MANAGER
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE
PO BOX 1547
BIG BEAR LAKE, CA 92315-1194
R.05-12-013

DENNIS M.P. EHLING
KIRKPATRICK & LOCKHART NICHOLSON GRAHAM
10100 SANTA MONICA BLVD., 7TH FLOOR
LOS ANGELES, CA 90067
R.05-12-013

MARGARET ELIZABETH MCNAUL
THOMPSON COBURN
1909 K STREET, N.W., SUITE 600
WASHINGTON, DC 20006-1167
R.05-12-013

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630
R.05-12-013

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.05-12-013

VICKI FERGUSON
BRAUN & BLAISING, PC
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814
R.05-12-013

MICHEL PETER FLORIO
SENIOR ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.05-12-013

BARRY R. FLYNN
FLYNN RESOURCE CONSULTANTS, INC.
5440 EDGEVIEW DRIVE
DISCOVERY BAY, CA 94514
R.05-12-013

MARK FRAZEE
CITY OF ANAHEIM
201 S. ANAHEIM BLVD., SUITE 802
ANAHEIM, CA 92805
R.05-12-013

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.05-12-013

DON P GARBER
ATTORNEY
SAN DIEGO GAS AND ELECTRIC COMPANY
101 ASH STREET
SAN DIEGO, CA 92101-3017
R.05-12-013

LAURA GENAO
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.05-12-013

MICHAEL J. GERGEN
LATHAM & WATKINS LLP
555 ELEVENTH STREET, NW
WASHINGTON, DC 20004-1304
R.05-12-013

PAT GIDEON
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-12-013

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.05-12-013

JOHN GOODIN
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630
R.05-12-013

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111
R.05-12-013

GEORGE HANSON
ASSISTANT GENERAL MANAGER
CITY OF CORONA
730 CORPORATION YARD WAY
CORONA, CA 92880
R.05-12-013

HANK HARRIS
CORAL POWER, LLC
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
R.05-12-013

LYNDA HARRIS
CALIFORNIA ENERGY RESOURCES SCHEDULING
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE, RM. 120
SACRAMENTO, CA 95821
R.05-12-013

AUDRA HARTMANN
LS POWER DEVELOPMENT
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814
R.05-12-013

ARTHUR L HAUBENSTOCK
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B30A
SAN FRANCISCO, CA 94177
R.05-12-013

LYNN M. HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814-3109
R.05-12-013

PHILIP HERRINGTON
REGIONAL VP, BUSINESS MANAGEMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVENUE
IRVINE, CA 92612-1046
R.05-12-013

Donna J Hines
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4102
SAN FRANCISCO, CA 94102-3214
R.05-12-013

SETH D. HILTON
STOEL RIVES
111 SUTTER ST., SUITE 700
SAN FRANCISSCO, CA 94104
R.05-12-013

Charlyn A Hook
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5033
SAN FRANCISCO, CA 94102-3214
R.05-12-013

EPIC INTERN
EPIC/USD SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
R.05-12-013

STEVE ISSER
VP, GENERAL COUNSEL
GOOD COMPANY ASSOCIATES
816 CONGRESS AVE., SUITE 1400
AUSTIN, TX 78701
R.05-12-013

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
R.05-12-013

AKBAR JAZAYERI
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.05-12-013

JOHN JENSEN
PRESIDENT
MOUNTAIN UTILITIES
PO BOX. 205
PO BOX. 205
KIRKWOOD, CA 95646
R.05-12-013

KEITH JOHNSON
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.05-12-013

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.05-12-013

KATIE KAPLAN
INDEPENDENT ENERGY PRODUCERS
ASSOCIATION
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814
R.05-12-013

MIKE KASABA
QUIET ENERGY
3311 VAN ALLEN PLACE
TOPANGA, CA 90290
R.05-12-013

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
R.05-12-013

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
R.05-12-013

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS
ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814-3947
R.05-12-013

KIMBERLY KIENER
IMPERIAL IRRIGATION DISTRICT
333 E. BARIONI BLVD.
PO BOX 937
IMPERIAL, CA 92251
R.05-12-013

GREGORY S.G. KLATT
ATTORNEY AT LAW--Wal-Mart Stores, Inc.
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
R.05-12-013

STEPHEN G. KOERNER
ATTORNEY AT LAW
EL PASO CORPORATION
2 NORTH NEVADA AVE.
COLORADO SPRINGS, CA 80903
R.05-12-013

DAVID X. KOLK
PH. D.
COMPLETE ENERGY SERVICES INC.
41422 MAGNOLIA STREET
MURRIETA, CA 92562
R.05-12-013

LAWRENCE KOSTRZEWA
REGIONAL VP, DEVELOPMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVENUE
IRVINE, CA 92612-1046
R.05-12-013

EDWARD V. KURZ
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
R.05-12-013

JEFF LAM
POWEREX CORP
666 BURRARD ST
VANCOUVER, CANADA V6C2X8
R.05-12-013

DOUGLAS LARSON
PACIFICORP
201 SOUTH MAIN STREET, SUITE 2300
SALT LAKE CITY, UT 84140
R.05-12-013

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814
R.05-12-013

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.05-12-013

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.05-12-013

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112
CMTA
ANTELOPE, CA 95843
R.05-12-013

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.05-12-013

DEBRA LLOYD
CITY OF PALO ALTO
250 HAMILTON AVE.
PALO ALTO, CA 94301
R.05-12-013

ED LUCHA
PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B9A
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-12-013

JANE E. LUCKHARDT
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
R.05-12-013

LYNELLE LUND
GENERAL COUNSEL
COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA, CA 92626
R.05-12-013

MARY LYNCH
REGULATORY AND LEGISTLATIVE AFFAIRS
CONSTELLATION ENERGY COMMODITIES GROUP
2377 GOLD MEADOW WAY, STE. 100
GOLD RIVER, CA 95670
R.05-12-013

DAVID MARCUS
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY, CA 94701-1287-1287
R.05-12-013

LYNN MARSHALL
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
R.05-12-013

ROBERT MARSHALL
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 HIGHWAY 70 STE A
PORTOLA, CA 96122-2000
R.05-12-013

FRED MASON
POWER RESOURCE & REVENUE ADMINISTRATOR
CITY OF BANNING
176 EAST LINCOLN
BANNING, CA 92220
R.05-12-013

JOHN P. MATHIS
ATTORNEY AT LAW
EDISON MISSION ENERGY
555 12TH ST., NW STE. 640
WASHINGTON, DC 20004
R.05-12-013

CHRISTOPHER MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060-4060
R.05-12-013

JAMES MAYHEW
MIRANT CORPORATION
1155 PERIMETER CENTER WEST
ATLANTA, GA 30338
R.05-12-013

MICHAEL MAZUR
3 PHASES ELECTRICAL CONSULTING
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266
R.05-12-013

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
R.05-12-013

BARRY F MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.05-12-013

DOUGLAS MCFARLAN
VP, PUBLIC AFFAIRS
MIDWEST GENERATION EME
440 SOUTH LASALLE ST., SUITE 3500
CHICAGO, IL 60605
R.05-12-013

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
California Municipal Utilities Association
8066 GARRYANNA DRIVE
CITRUS HEIGHTS, CA 95610
R.05-12-013

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
R.05-12-013

Rahmon Momoh
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4205
SAN FRANCISCO, CA 94102-3214
R.05-12-013

RONALD MOORE
SOCAL WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
R.05-12-013

IRENE K. MOOSEN
ATTORNEY AT LAW
REGENTS OF UNIVERSITY OF CALIFORNIA
53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112
R.05-12-013

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903
R.05-12-013

MARIC MUNN
OFFICE OF THE PRESIDENT
UNIVERSITY OF CALIFORNIA
1111 FRANKLIN STREET, 6TH FLOOR
OAKLAND, CA 94607
R.05-12-013

ROBERT S. NICHOLS
NEW WEST ENERGY
PO BOX 61868
PHOENIX, AZ 85082-1868
R.05-12-013

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
R.05-12-013

JEANNETTE OLKO
COLTON ELECTRIC DEPARTMENT
650 N LA CADENA DR
COLTON, CA 92324-2823
R.05-12-013

ERIC OLSON
NAVIGANT CONSULTING INC.
3100 ZINFANDEL DR., STE 600
RANCHO CORDOVA, CA 95670-6078
R.05-12-013

Karen P Paull
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5027
SAN FRANCISCO, CA 94102-3214
R.05-12-013

JOHN PACHECO
CALIFORNIA ENERGY RESOURCES
SCHEDULING
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821
R.05-12-013

JUDY PAU
DAVIS, WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111-3834
R.05-12-013

PHILIP D. PETTINGILL
CAISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013

RANDALL PRESCOTT
BP ENERGY COMPANY
501 WESTLAKE PARK BLVD.
HOUSTON, TX 77079
R.05-12-013

NICOLAS PROCOS
Utility Analyst
ALAMEDA POWER & TELECOM
2000 GRAND STREET
ALAMEDA, CA 94501-0263-0263
R.05-12-013

ADRIAN PYE
ENERGY AMERICA, LLC
263 TRESSER BLVD.
STAMFORD, CT 6901
R.05-12-013

MANUEL RAMIREZ
CITY AND COUNTY OF SAN FRANCISCO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
R.05-12-013

CHRIS RAPHAEL
CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110
R.05-12-013

JOHN REDDING
ARCTURUS ENERGY CONSULTING, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.05-12-013

JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062
R.05-12-013

MIKE RINGER
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814
R.05-12-013

Grant Rosenblum
STAFF COUNSEL
ELECTRICITY OVERSIGHT BOARD
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013

THEODORE ROBERTS
SEMPRA ENERGY
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017
R.05-12-013

JAMES ROSS
REGULATORY & COGENERATION
SERVICES, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.05-12-013

Nancy Ryan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5217
SAN FRANCISCO, CA 94102-3214
R.05-12-013

JUDITH SANDERS
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013

DAVID SANDINO
DEPARTMENT OF WATER RESOURCES
1416 NINTH ST.
P.O. BOX 942836
SACRAMENTO, CA 94236
UNITED STATES
R.05-12-013

SOUMYA SASTRY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-12-013

MEGAN SAUNDERS
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017
R.05-12-013

JANINE L. SCANCARELLI
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111
R.05-12-013

STEVEN S. SCHLEIMER
DIR. OF MARKET & REGULATORY AFFAIRS
CALPINE CORPORATION
3875 HOPYARD RD.
PO BOX 11749
PLEASANTON, CA 94588-1749
R.05-12-013

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
California City-County Street Light Assoc.
BERKELEY, CA 94703-2714
R.05-12-013

STEPHEN J. SCIORTINO
INTEGRATED RESOURCES MANAGER
CITY OF ANAHEIM
201 SOUTH ANAHEIM BLVD., SUITE 802
ANAHEIM, CA 92805
R.05-12-013

LILI SHAHRIARI
AOL UTILITY CORP.
12752 BARRETT LANE
SANTA ANA, CA 92705
R.05-12-013

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
R.05-12-013

KAREN M SHEA
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-12-013

ROBERT SHERICK
DIRECTOR - POWER SUPPLY
PASADENA WATER AND POWER
150 S. LOS ROBLES, SUITE 200
PASADENA, CA 91101
R.05-12-013

LINDA Y. SHERIF
ATTORNEY AT LAW
CALPINE CORPORATION
3875 HOPYARD RD. SUITE 345
PLEASANTON, CA 94588
R.05-12-013

MARY O. SIMMONS
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD, P.O. BOX 10100
RENO, NV 89520
R.05-12-013

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO, CO 81301
R.05-12-013

KEN SIMS
SILICON VALLEY POWER
1601 CIVIC CENTER DR. NO. 201
SANTA CLARA, CA 95050
R.05-12-013

MARK J. SMITH
FPL ENERGY
383 DIABLO RD., SUITE 100
DANVILLE, CA 94526
R.05-12-013

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-12-013

SEEMA SRINIVASAN
ALCANTAR & KAHL
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.05-12-013

Robert L. Strauss
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 2-A
SAN FRANCISCO, CA 94102-3214
R.05-12-013

MERIDETH TIRPAK STERKEL
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-12-013

HSI BANG TANG
AZUSA LIGHT, POWER & WATER
729 N. AZUSA AVENUE
AZUSA, CA 91702-9500
R.05-12-013

MICHAEL TENEYCK
ADMINISTRATIVE RESOURCES MANAGER
CITY OF RANCHO CUCAMONGA
10500 CIVIC CENTER DRIVE
RANCHO CUCAMONGA, CA 91730
R.05-12-013

KAREN TERRANOVA
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.05-12-013

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821
R.05-12-013

BRIAN THEAKER
WILLIAMS POWER COMPANY
3161 KEN DEREK LANE
PLACERVILLE, CA 95667
R.05-12-013

MONA TIERNEY
CONSTELLATION NEWENERGY, INC.
2175 N. CALIFORNIA BLVD., STE. 300
WALNUT CREEK, CA 94596
R.05-12-013

SCOTT TOMASHEFSKY
REGULATORY AFFAIRS MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
NORTHERN CALIFORNIA POWER AGENCY
ROSEVILLE, CA 95678
R.05-12-013

WAYNE TOMLINSON
EL PASO NATURAL GAS
PO BOX 1087
COLORADO SPRINGS, CO 80944
R.05-12-013

NANCY TRONNAS
CALIFORNIA ENERGY COMMISSION
1516 9TH ST. MS-20
SACRAMENTO, CA 95814-5512
R.05-12-013

LEEANNE UHLER
PROJECTS/CONTRACTS MGR
CITY OF RIVERSIDE
2911 ADAMS STREET
RIVERSIDE, CA 92504
R.05-12-013

ANDREW ULMER
CALIFORNIA DEPARTMENT OF WATER RESROURCE
3310 EL CAMINO AVE., STE. 120
SACRAMENTO, CA 95821
R.05-12-013

ROGER VAN HOY
ASSISTANT GENERAL MANAGER
MSR PUBLIC POWER AGENCY
1231 11TH STREET
MODESTO, CA 95352
R.05-12-013

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016
R.05-12-013

DEVRA WANG
STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.05-12-013

JOY WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.05-12-013

Mark S. Wetzell
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5009
SAN FRANCISCO, CA 94102-3214
R.05-12-013

JAMES WEIL
AGLET CONSUMER ALLIANCE
PO BOX 37
COOL, CA 95614
R.05-12-013

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.05-12-013

ANDREA WELLER
ATTORNEY AT LAW
STRATEGIC ENERGY, LTD
7220 AVENIDA ENCINAS, SUITE 120
CARLSBAD, CA 92209
R.05-12-013

MICHAEL WERNER
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE, LL90
SACRAMENTO, CA 95821
R.05-12-013

WILLIAM W. WESTERFIELD III
STOEL RIVES LLP
770 L STREET, SUITE 800
SACRAMENTO, CA 95814
R.05-12-013

JOSEPH F. WIEDMAN
GOODIN MACBRIDE SQUERI RITCHIE & DAY,LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-12-013

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105
R.05-12-013

DAVID WITHROW
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814
R.05-12-013

E.J. WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, SUITE 110
HOUSTON, TX 77046
R.05-12-013

Robert J. Wullenjohn
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5212
SAN FRANCISCO, CA 94102-3214
R.05-12-013

ERIC YUSSMAN
REGULATORY ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE, KY 40223
R.05-12-013

TONY ZIMMER
180 CIRBY WAY
ROSEVILLE, CA 95678-6420
R.05-12-013

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, STE 1440
OAKLAND, CA 94612-3517
R.05-12-013

CALIFORNIA ENERGY MARKETS
517 B POTRERO AVENUE
SAN FRANCISCO, CA 94110-1431
R.05-12-013

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-12-013